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IN THE

Supreme Court of the United States

OCTOBER TERM, 1980

HAVENS REALTY CORPORATION and ROSE JONES,
Petitioners,

vs.

SYLVIA COLEMAN, R. KENT WILLIS AND HOUSING OPPORTUNITIES MADE EQUAL,
Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

AMICUS CURIAE BRIEF OF THE CITY OF RICHMOND IN SUPPORT OF RESPONDENTS

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INTEREST OF THE CITY OF RICHMOND

The decision of the Fourth Circuit Court of Appeals will have a direct and immediate impact on housing development in the City of Richmond.

First, the Fourth Circuit's decision grants Housing Opportunities Made Equal (HOME), a fair housing opportunities organization in the Richmond Metropolitan Area, standing as a private attorney general to bring actions under the Fair Housing Act of 1968.

Second, the decision has a "chilling effect" on those real estate brokers and agents whose purpose and intent is to foster racially segregated communities in the Richmond Metropolitan Area.

Third, it creates a climate conducive to the establishment of natural racially integrated neighborhoods, rather than the artifically segregated neighborhoods that would result from impermissible racial steering practices.

Fourth, the decision granting HOME standing furthers the legislative intent of the Fair Housing Act of 1968 by according private parties the right to bring housing discrimination lawsuits against those parties determined to violate the law.

Fifth, the decision of the Fourth Circuit permits fair housing organizations such as HOME to implement contractual obligations with the federal, state and local governments to provide fair housing information and counseling services.

I
DESCRIPTION OF THE CITY OF RICHMOND

The City of Richmond ("CITY") is a municipal corporation duly organized under the laws of the Commonwealth of Virginia. The city is situated in central Virginia. It is surrounded by the County of Henrico to the north, east and west, and by Chesterfield County to the south.

The City has a population of 219,214, of which 112,357 are black and 106,857 are white. Henrico County's population is 180,735 of which 15% is black and 85% is white. Chesterfield County has a population of 126,134, with blacks comprising 9.7% of its residents.

There are distinct patterns of racial housing in the City and County of Henrico (County) as are illustrated on the map in Addendum A. There is a high concentration of blacks in the inner-city and fewer blacks residing on the outerlying sections of the City. The map also displays a higher concentration of blacks in the northern section of Henrico county and a low concentration of blacks in western Henrico County, especially in the area surrounding Camelot and Colonial Apartments, owned by Havens Realty Corporation.

Addendum B illustrates the movements of blacks in the City of Richmond from 1970 through 1978. The map displays a significant amount of movement of blacks into the southwestern section of the City. It also shows little movement of blacks into western Henrico and a significant rise in the number of blacks moving into northern Henrico.

Appendix C compares the movement of blacks into similar apartment complexes in the City and the County.

II
THE CITY'S RELATIONSHIP TO "HOME"

The City has been a source of HOME's funding since October, 1974. The City has contracted with HOME for the provision of housing information and counseling programs in the Richmond Metropolitan Area. The funding has increased from the initial contractual amount of $36,000 for fiscal year 1974-1975 to $90,000 for fiscal year 1980-81. HOME has been a quasi-public, but private, housing information and service organization in the Richmond Metropolitan area. Its membership includes residents from throughout the City of Richmond and the County. Friends of HOME listed on its letterhead include the City of Richmond's representatives in the Virginia General As-

sembly; four members of the Richmond City Council, including its Mayor; and the United States Congressman from the Richmond Metropolitan Congressional District.

HOME's contract with the City requires HOME to provide housing counseling and information services for the entire Richmond Metropolitan Area. This understanding was spelled out in letters dated April 10, 1977 and September 2, 1978 from Richmond City Manager, William J. Leidinger, to Barbara Wurtzel, Executive Director of HOME. (See Addenda D and E)

III
PURPOSE OF THE CITY OF RICHMOND'S AMICUS CURIAE BRIEF

The City's purpose for submitting this brief is to provide this Court with some insights into the setting and parties affected by the Fourth Circuit's decision to grant HOME and its "testers" standing to bring fair housing discrimination lawsuits. The City's brief will focus attention on the relationship HOME has with the City of Richmond, the jurisdiction that racial steering has a great impact upon. The brief directs the Court's attention toward those cogent issues and facts that adversely affect the housing market within the City and in neighboring Henrico County.

The City has neither the experience, resources nor personnel available to investigate and prepare housing discrimination matters for litigation. In order to facilitate its objectives of eradicating unfair housing practices, the City contracts with HOME to provide housing information and counseling services for the Richmond Metropolitan Area. The contractual relationship between HOME and the City City does not specifically require HOME to bring fair housing discrimination lawsuits. However, if it is to discharge its obligation to provide Richmond residents with accurate information and fair housing services, then it must pursue the remedies available to eliminate housing discrimination. A natural spinoff of HOME's housing information

services is the prosecution of lawsuits against real estate brokers and agents who engage in discriminatory housing practices.

The City does not enter into contracts with just any vigilante organization whose sole objective is to bring lawsuits to enforce the Fair Housing Act. It contracts with HOME because its goals and objectives are consistent with the City's fair housing policies. Furthermore, the City is aware of the fact that HOME has the personnel and resources required to perform its contractual obligations with the City. Where litigation is required to eliminate unfair housing practices, the City expects HOME to use that remedy if necessary.

Havens Realty Corporation's (Havens) practices of racial steering frustrates HOME's ability to fulfill its contractual obligations with the City. Where HOME receives inaccurate information from Havens and knowingly passes this false information on to its clients, then HOME, itself, becomes a violator of the Fair Housing Act. The integrity and credibility of HOME will then be second-guessed by the City. HOME's continued funding through the City would consequentially be greatly jeopardized.

Havens racial steering practices proliferates the flight of white Richmonders to the surrounding counties. At the same time black Richmonders have no choice but to remain in the City or live in areas relegated to blacks in Henrico County. Indeed such practices foster an artifically segregated Richmond community -- the City becomes a "black ghetto" and the County a "white ghetto".

The Fourth Circuit's broad construction of the Fair Housing Act in this case is lauded by the City. The decision to accord standing to HOME and its "testers" to litigate Fair Housing Act claims is another step toward eliminating the illegal vexatious practice of racial steering.

Discriminatory housing practices have become subtle and more sophisticates since the enactment of the Fair Housing Act in 1968. The decision of the Fourth Circuit providing HOME with standing to sue is another arm of enforcement against those individuals and companies

whose purpose and intention is to violate the Fair Housing laws.

SUMMARY OF ARGUMENT

This Court must determine whether HOME, a fair housing organization, has alleged sufficient injury to its membership or itself as an entity to entitle it to standing to sue under the Fair Housing Act. 42 U.S.C. Section 3601, *et seq.*

HOME, as representative of its membership, and as an organization, has alleged sufficient injury to sue under the Fair Housing Act. It should have been given the opportunity to prove at trial that, 1) it is truly representative of its membership that has been injured; 2) it has been injured to the extent that it cannot fulfill its contractual obligations with the City, State and HUD; and 3) that it was acting as a "private attorney general" to open up the doors of housing in the Richmond Metropolitan Area to people of all races, colors, sexes, religions and national origins.

HOME has alleged sufficient injury as an entity to confer standing upon it. The Fourth Circuit's decision is consistent with this Court's ruling in *Trafficante* v. *Metropolitan Life Insurance Co.*, 409 U.S. 205(1972) and *Gladstone, Realtors* v. *Village of Bellwood*, 441 U.S. 91(1979), and that the trial court erred when it dismissed HOME prior to hearing any evidence regarding the manner in which HOME was injured as a result of Havens actions.

The City further submits that HOME has alleged sufficient injury to its members so as to confer upon it standing to sue Havens as representative of its members. HOME alleged sufficient injury in its Complaint to survive Havens motion to dismiss; and the trial court erred by dismissing HOME prior to reviewing any evidence as to whether HOME has suffered injury to confer representative standing upon it under the standards enunciated by this Court in *Hunt* v. *Washington, Apple Advertising Commission*, 432 U.S. 333 (1977).

ARGUMENT

I. HOME HAS STANDING UNDER ARTICLE III OF THE CONSTITUTION

Housing Opportunities Made Equal (HOME) is a Virginia non-profit corporation whose purpose is to eliminate unlawful discriminatory housing practices in the Richmond Area.

> HOME activities include: assisting individuals of all races in obtaining housing in the metropolitan area through the operation of a housing counseling service; investigating allegations of discrimination and referring complaints to appropriate federal and state authorities; conducting independent investigations of real estate brokers in the metropolitan area to determine whether housing is being made available without regard to race; and taking appropriate steps to eliminate any racial discriminatory housing practices it may have found that exist. (Appendix 65)

HOME has a membership of approximately 600 individuals residing throughout the Richmond Metropolitan Area.

HOME has been under contract with the City of Richmond since 1974 to provide the services listed in the activities stated above. The City's satisfaction with its work is reflected in the increases in funding from $36,000 in 1974 to $90,000 in 1981. Since 1974, more than $450,000 have been funneled through the City of Richmond to HOME for fair housing services.

HOME brought this action under the Fair Housing Act of 1968, 42 U.S.C. Sections 3601, 3604, 3612(a). It alleged in the Complaint that it "has been frustrated by defen-

dants' racial steering practices in its efforts to assist equal access to housing through counseling and other referral services."

> HOME further alleges in its Complaint that its members have as a result of defendants' practices, been deprived of the right to the important social, professional, business and economic, political and aesthetic benefits of interracial association that arises from living in integrated communities free from discriminatory housing practice . . .
> (Appendix 68)

The trial court dismissed HOME as a plaintiff in this lawsuit for lack of standing. (Appendix 32).

The Court of Appeals unanimously reversed the trial courts decision and ruled that HOME and its "testers" have standing to sue under the Fair Housing Act. (Appendix 63).

This Court must now decide on the question of whether HOME and its "testers" have alleged sufficient injury under Article III of the Constitution to accord them standing to litigate Fair Housing Act lawsuits.

The question of standing is whether the litigant is entitled to have the court decide the merits of a dispute or of particularized issues. This injury involves both constitutional limitations on federal-court jurisdiction and prudential limitations on its exercise. E.g. *Barrow* v. *Jackson*, 346 U.S. 249, 255, 256 (1953); *Warth* v. *Seldin*, 422 U.S. 490, 498 (1975).

In its constitutional dimension, standing imports justiciability: whether the plaintiff has made out a "case or controversy" between himself and the defendant within the meaning of Article III. Justiciability is the threshold question in every federal case determining the power of the court to entertain the suit. As an aspect of justiciability, the standing question is whether the plaintiff has "alleged such a personal stake in the outcome of the controversy"

as to warrant his invocation of federal court jurisdiction and to justify the exercise of the court's remedial powers on his behalf. *Baker* v. *Carr*, 369 U.S. 186, 204 (1962).

Although standing in no way depends on the merits of the plaintiff's contention that the particular conduct is illegal, it often turns on the nature and source of the claim asserted. The actual or threatened injury required by Article III may exist solely by virtue of the "statutes creating legal rights, the invasion of which creates standing". *Warth, supra,* at 500; *Linda R.S.* v. *Richard D.* 410 U.S. 614, 617 at n. 3 (1973); *Sierra Club* v. *Morton* 405 U.S. 727, 732 (1972).

II. A. HOME HAS STANDING AS REPRESENTATIVE OF ITS MEMBERS

The gravamen of the question of HOME's standing as the representative of its membership lies in this Court's interpretation of *Hunt* v. *Washington Apple Advertising Commission*, 432 U.S. 333, 343 (1977).

This Court defined representative standing:

> [A]n association has standing to bring suit on behalf of its members when: (a) its members would otherwise have standing to sue in their own right; (b) the interest it seeks to protect are germane to the organization's purpose; and (c) neither the claim asserted nor the relief requested requires the participation in the lawsuit of each of the individual members. (Appendix 75)

The trial court dismissed HOME without giving it the opportunity to prove that its members lived in the community affected by Havens' racial steering practices. As a matter of fact, a member of HOME has resided in Camelot apartments during all the relevant time of this lawsuit.

This Court ruled in *Warth* v. *Seldin, supra*, that:

> For purposes of ruling on a motion to dismiss for want of standing, both the trial and reviewing courts must accept as true all material allegations in favor of the complaining party. At the same time, it is within the trial court's power to allow or to require the plaintiff to supply by amendment to the complaint or by affidavit, further particularized allegations of fact deemed supportive of plaintiff's standing.

Id. at 501, 502.

The factual allegations in the case at bar are unusually similar to those in *United States* v. *SCRAP*, 412 U.S. 669 (1973). In *SCRAP*, the plaintiffs alleged that the Interstate Commerce Commission's decision to suspend tariff surcharges on railroads would cause its members "economic, recreational and aesthetic harm". *United States* v. *SCRAP, supra*, at 675, 676. On the issue of standing this Court stated:

> We cannot say on these pleadings that the allegations which, if proved, would place them squarely among those persons injured in fact by the commission's action and entitled under the clear import of Sierra Club. The District Court was correct in *denying* appellant's motion to dismiss the complaint for failure to allege sufficient standing to bring the lawsuit. (emphasis added)

United States v. *SCRAP, supra*, at 689, 690.

The trial court erred by dismissing HOME and its "testers" without giving them the opportunity to either amend the complaint or proffer affidavits to support their particularized allegations of injury. If the allegations against Havens were in fact untrue, then summary judgment would have been the appropriate remedy rather than a motion to dismiss. *United States* v. *SCRAP, supra*, 689.

The court of appeals correctly ruled that HOME has standing to sue on behalf of its members. This Court ruled in *Trafficante* v. *Metropolitan Life Insurance Co. supra*, at 209, that individuals are persons "aggrieved" as defined in Section 810(a) of the Fair Housing Act, whenever such persons claim to have been injured by a discriminatory housing practice.

The allegations stated in HOME's complaint rests squarely within the standing requirements recognized by this Court in *SCRAP*, *Trafficante* and *Village of Bellwood* to confer upon it the right to sue for discriminatory housing practices in federal courts. To deny HOME standing as representative of its members would be completely oblivious to this Court's prior decisions on standing, and effectively disarm the "private attorneys general" conceived of by the Fair Housing Act to enforce the mandates of the law.

III. HOME HAS STANDING TO SUE AS AN ENTITY

HOME alleges in its complaint that it has been frustrated in its efforts to assist equal access to housing through counseling and other referral services. As noted earlier, HOME has been under contract with the City to provide housing information and counseling services since 1974. Through various forms of correspondences, HOME has placed all realtors in the Richmond Metropolitan Area, including Havens, on notice of its contractual relationship with the City, State and Federal governments.[1]

HOME has been injured by Havens in its ability to

[1] A letter and questionnaire listing HOME's activities and stating that it was funded by the local, state and federal governments was sent to all real estate brokers and agents during each of the years from 1974 through 1980. A follow-up telephone call was made to each real estate broker who did not respond to the questionnaire in order to obtain information regarding the apartment sizes, cost of rental, and renter qualifications. Each correspondence detailed HOME's activities and solicited the assistance of real estate brokers and agents in its endeavors.

perform housing information and counseling services under its contract with the city. The injury suffered by HOME in this regard is strikingly similar to the injury sustained by the non-profit developer in *Village of Arlington Heights* v. *Metropolitan Housing Development Corp.*, 429 U.S. 252 (1977). In *Arlington Heights* this Court stated:

> MHDC is a nonprofit corporation. Its interest in building Lincoln Green stems not from a desire for economic gain, but rather from an interest in making suitable low-cost housing available in areas where such housing is scarce. This is not mere abstract concern about problem of general interest. See *Sierra Club* v. *Morton*, 405 U.S. 727 (1972). The specific project MHDC intends to build, whether or not it will generate profits, provides that "essential dimension of specificity" that informs judicial decision-making.

Id. at 263.

The injury suffered by HOME is more than an abstract concern for the development of an integrated Richmond Metropolitan Area. But rather HOME's ability to discharge its responsibilities under its contract with the City, as well as, the state and federal governments, and the community in general, is thwarted by the discriminatory housing practices of Havens.

Havens' racial steering practices, in fact, amount to tortiously interfering with HOME's ability to perform its contractual duties with the City. Even though neither the City nor HOME have pursued an action of tortious interference with contract against Haven; indeed, all the essential elements of such a claim are present in this case:

(1) There exist a contract between the City and HOME.

(2) Havens has knowledge or should have had knowledge of the contract through the correspondences forwarded to it by HOME and ordinances passed by Richmond City Council.[2]

(3) Havens has deliberately steered blacks away from Camelot and Colonial Apartments in violation of the Fair Housing Act, thereby impeding HOME's ability to provide accurate information on fair housing in the Richmond Metropolitan Area.

(4) There is no justification for Havens' racial steering practices.

(5) HOME is damaged to the extent that it cannot properly perform its contractual obligations to the City.

See 45 *Am Jur* 2d, Interference, 39; and *American Surety Company* v. *Schattenbauer,* 257. F. 2d, 4, 11 (1958).

Without question, HOME has been frustrated in its efforts to provide fair housing information services by Havens' racial steering practices. HOME's inability to provide accurate housing information could in fact lead to the loss of funding from the City, and even the state and federal governments.

The integrity of HOME as a fair housing organization is demeaned by Havens' racial steering practices. HOME is recognized in the Richmond Metropolitan Area as the agency that monitors and enforces fair housing opportunities. If it is unable to provide those services, then its *raison d'etre* will be completely undermined. Without an effective fair housing organization such as HOME,

[2]City of Richmond Ordinance No. 77-58-69 allocated $36,000 in Community Development Block Grant funds to HOME for housing and counseling services in 1977.

the residents of the City and its surrounding counties would be deprived of the enforcer of important social, professional, business and economic, political and aesthetic benefits of interracial association that arise from living in an integrated community free from discriminatory housing practices. Fair Housing Act violators such as Havens would then be free to carry out all their racially discriminating housing policies without fear of vengeance.

The Fair Housing Act was designed to give private parties, such as HOME, the right to enforce the mandates of this law. Under the Act, the Department of Housing and Urban Development (HUD) has no enforcement powers. This limitation on federal agency enforcement powers would seem to infer that it was the intention of Congress to delegate the right to enforce the Act to private parties. Indeed, this Court recognized private enforcement of the Act in *Trafficante* v. *Metropolitan Life Insurance Company*, 409 U.S. 205 (1972):

> Since HUD has no enforcement powers and since the enormity of the task of assuring fair housing makes the role of the Attorney General in the matter minimal, the main generating force must be private suits in which . . . the complainants act not only on their own behalfs, but also "as private attorneys general in vindicating the policy that Congress considered to be of the highest priority."

Id. at 211

The City of Richmond is committed to fair housing opportunities for all people in the Richmond Metropolitan Area. Because the City possesses neither the experience, personnel or resources to thoroughly develop and implement its fair housing program, it delegates that responsibility to HOME. Certainly, the City would have standing under this Court's ruling in *Gladstone, Realtor* v. *Village of Bellwood*, 441 U.S. 91 (1979)

> The constitutional limits of respondents' standing to protest the intentional segregation of their community do not vary simply because that community is defined in terms of city blocks rather than apartment buildings. Rather, they are determined by the presence or absence of "distinct and palpable injury" to respondent resulting from petitioner's conduct.

Village of Bellwood, supra, at 114.

It is therefore fair to reason that HOME should concomitantly be accorded the same standing right as the City, since it is under contract to, and in fact performs as an extension of the City's fair housing program.

The need for organizations such as HOME becomes obvious when one observes the map of the City and Henrico County in Addendum A. Distinct lines of demarcation separate black neighborhoods from white communities. The Richmond Metropolitan Area is manifestly the victim of discriminating realtors such as Havens, who steers blacks away from their neighborhoods and encourages whites to move therein.

The affects of discriminatory housing practices spill over into every aspect of life in the Richmond Metropolitan Area, particularly in the City of Richmond. The City is divided into nine wards – five predominantly black and the other four predominantly white. Each ward's representation on City Council mirrors its racial composition. The racial makeup of these wards is the result of many years of discriminatory housing practices, where blacks have been steered into certain communities and whites directed into other areas of the City.

The adverse consequences attendant upon a "changing" neighborhood is evident in the racial composition of City and County public school systems. The City's public school system is 84% black, while the County school system is 80% white. Each school system operates independently. A *de facto* segregated school system in the

Richmond Metropolitan Area has therefore developed from the communities' housing patterns. The City and the County have thereby been injured as a result of its segregated school systems. (See *Village of Bellwood, supra,* at 110, footnote 24.)

The map in Appendix B indicates that the Richmond Metropolitan Area is undergoing changes in its neighborhood patterns. As this Court stated in *Bellwood,* it is unimportant in any analysis of standing that "a segregated community was prevented from becoming integrated" because of unfair housing practices, or "that an integrated neighborhood is becoming a segregated community" because of racial steering practices. In both situations, the deprivation of the benefits of interracial associations constitutes the alleged injury. *Gladestone, Realtor* v. *Villiage of Bellwood,* supra, at 113, n. 26.

Not only are the residents of Camelot and Colonial Apartments, owned by Havens, injured as a result of racial steering, but the entire Richmond community.

> The person on the landlord's blacklist is not the only victim of discriminatory housing practices; it is as Senator Javits said in supporting the bill, "the whole community", 114 Cong. Rec. 2706, and, as Senator Mondale who drafted Section 810(a) said, the reach of the proposed law is to replace the ghetto "by truly integrated and balanced living patterns".

Trafficante v. *Metropolitan Life Insurance Co. supra,* at 210.

The desire of Richmonders to live in an integrated community is undermined by the racial steering practices of Havens in this case. Havens has only two apartment complexes in the Richmond Metropolitan Area. However, the segregated patterns of housings illustrated in the map in Addendum A reveal a widespread practice of racial steering in the City and County.

The City urges this Court to uphold the decision of the

court of appeals below to grant HOME standing to sue racist real estate broker for fair housing violations. Denying HOME standing, will have the effect of stripping it of its ultimate weapon against unfair housing practitioners.

The City urges this Court to send out a signal to unfair housing realtors that their practices are against the law, and that organizations such as HOME can and will sue them when they violate the fair housings laws.

CONCLUSION

The purpose of the Fair Housing Act of 1968 is to eliminate discrimination in housing in America. The Act makes unlawful, practices and conduct that discriminates against individuals because of his or her race, color, religion, sex or national origin. The Act codifies the feelings of fair-minded Americans who wish to live in a free integrated society.

The practices of Havens Realty Corporation in this case are deplorable. Its racial steering practices would go virtually unheeded, but for a fair housing organization in the City of Richmond, known as HOME. Havens' illegal housing practices were recognized by HOME, and the appropriate lawsuit was commenced to eliminate this unlawful behavior.

HOME's objectives, goals and policies are to eliminate racial discrimination in housing in the Richmond Metropolitan Area. It has a contractual responsibility to the City to provide fair housing opportunities for the entire Richmond area. HOME has a moral duty to its members and community in general to take the necessary steps, including litigation, to eradicate unfair housing practices. It has been frustrated and injured as a result of Havens' racial steering practices. The entire Richmond community has been injured because of discriminatory housing practices.

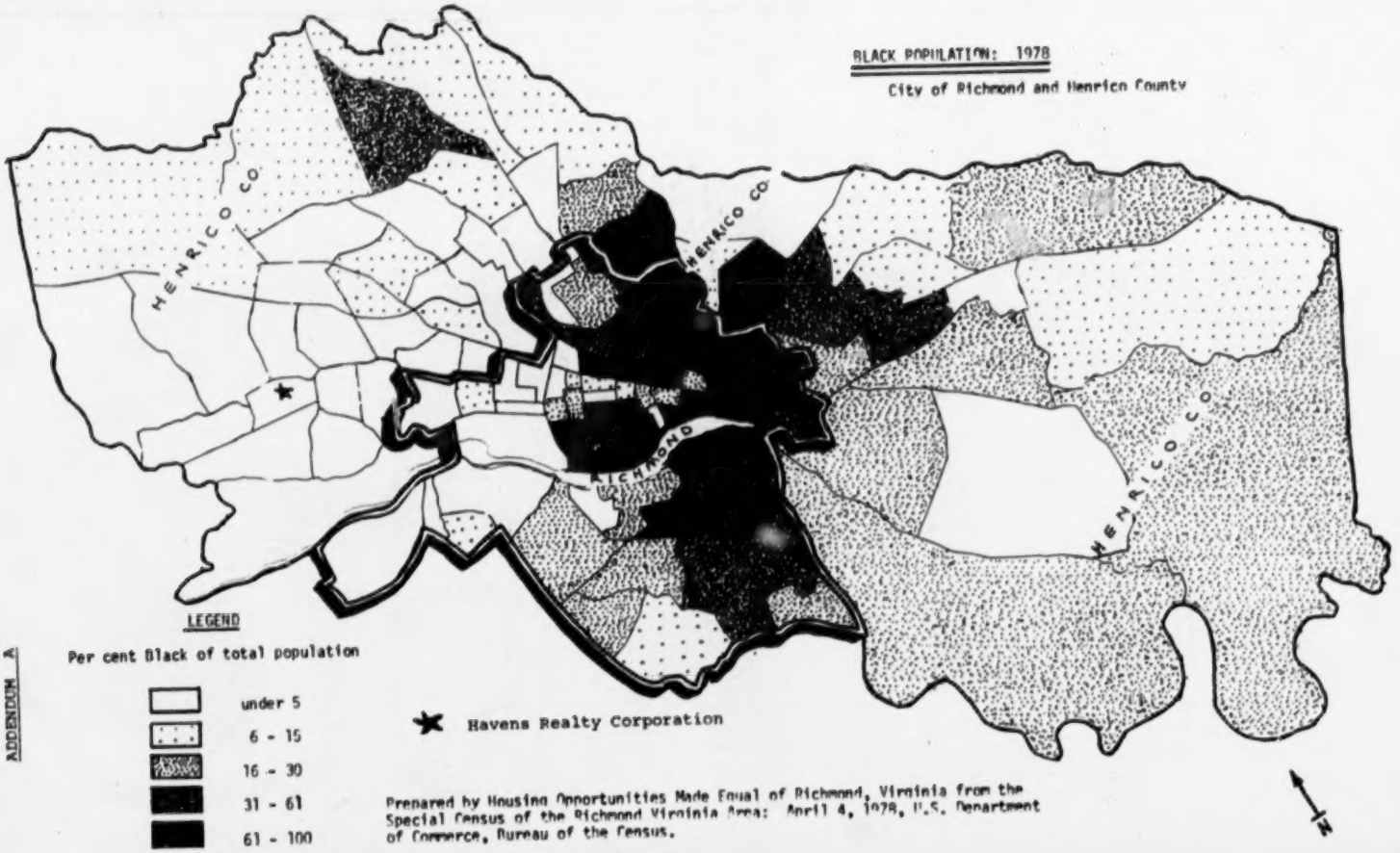
It was the intention of Congress with the passage of the Fair Housing Act to arm private parties, such as HOME, with standing to sue to eliminate unfair housing practices.

It is for these reasons, the City submits that this Honorable Court should accord HOME standing to sue under the Fair Housing Act and affirm the decision of the court of appeals.

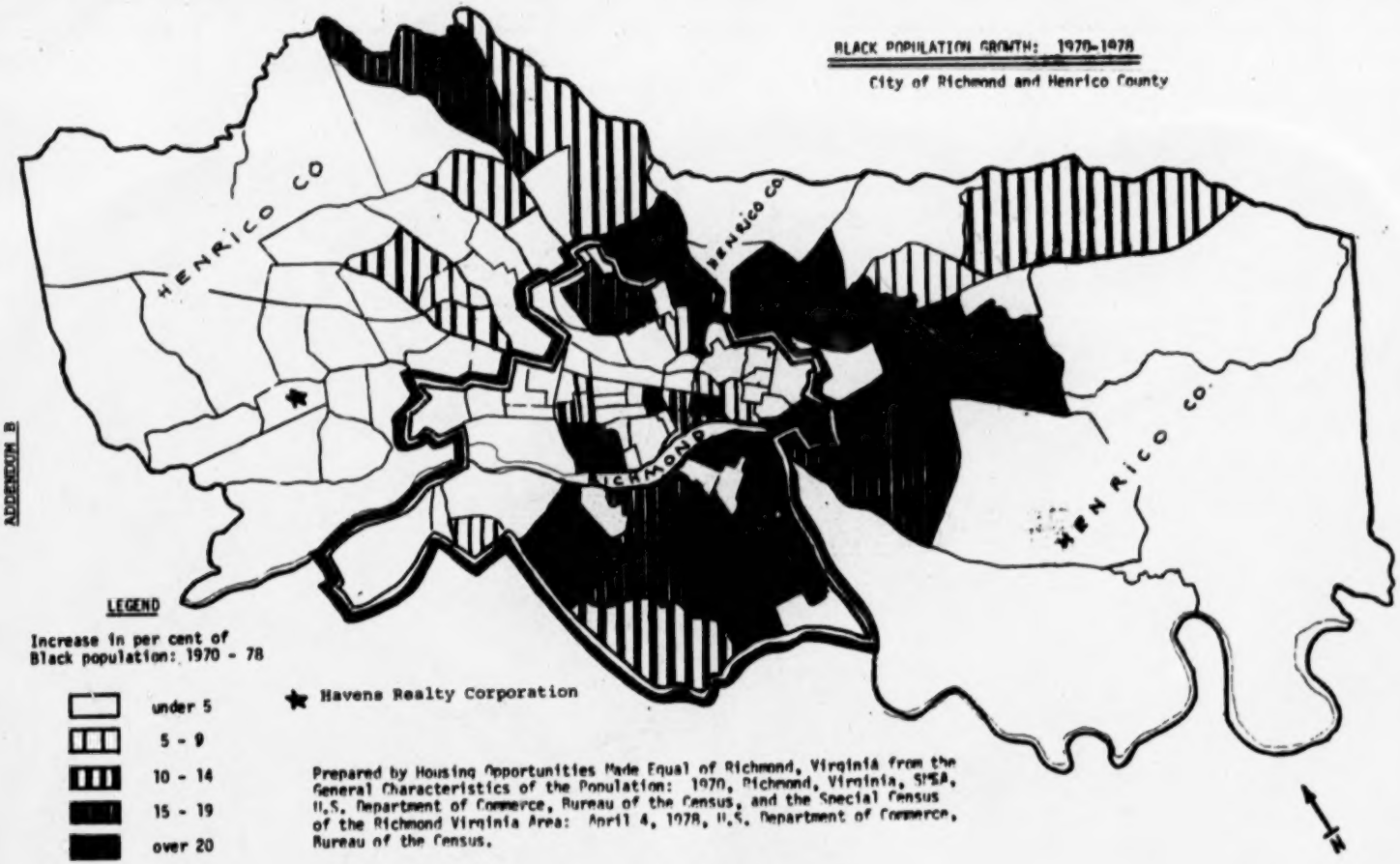
Respectfully submitted,

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City of Richmond
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Counsel for Amicus Curiae

ADDENDUM A


BLACK POPULATION: 1978
City of Richmond and Henrico County
HENRICO CO
HENRICO CO
RICHMOND
HENRICO CO
LEGEND
Per cent Black of total population
under 5
6 - 15
16 - 30
31 - 61
61 - 100
Havens Realty Corporation
Prepared by Housing Opportunities Made Equal of Richmond, Virginia from the Special Census of the Richmond Virginia Area: April 4, 1978, U.S. Department of Commerce, Bureau of the Census.
N

ADDENDUM B


BLACK POPULATION GROWTH: 1970-1978
City of Richmond and Henrico County
HENRICO CO
HENRICO CO
RICHMOND
HENRICO CO
LEGEND
Increase in per cent of Black population: 1970 - 78
under 5
5 - 9
10 - 14
15 - 19
over 20
Havens Realty Corporation
Prepared by Housing Opportunities Made Equal of Richmond, Virginia from the General Characteristics of the Population: 1970, Richmond, Virginia, SMSA, U.S. Department of Commerce, Bureau of the Census, and the Special Census of the Richmond Virginia Area: April 4, 1978, U.S. Department of Commerce, Bureau of the Census.
N

ADDENDUM C

DISTRIBUTION OF APARTMENT COMPLEXES IN THE SAME PRICE RANGE AS COLONIAL COURT
(over map of Black Population Growth: 1970-1978)

City of Richmond and Henrico County



LEGEND

⊙ Location of apartment complexes in the same price range as Colonial Court ($226 - 250 in February of 1978)

Prepared by Housing Opportunities Made Equal of Richmond, Virginia from: General Characteristics of the Population - 1970, Richmond, Virginia, SMSA, U.S. Department of Commerce, Bureau of the Census; the Special Census of the Richmond, Virginia Area: April 4, 1978, U.S. Department of Commerce, Bureau of the Census; and, the Apartment Seekers Guide, Feb. 1978, published by Housing Opportunities Made Equal of Richmond, Virginia.

ADDENDUM D

City of Richmond
Office of the City Manager

900 East Broad Street, Richmond, Virginia 23219
804-780-5386

September 2, 1977

Mrs. Barbara Wurtzel, Executive Director
H.O.M.E.
503 East Main Street
Richmond, Virginia 23219

Dear Mrs. Wurtzel:

The Housing Action Plan, completed last year by the City, included a number of recommendations for meeting the housing needs of our citizens. Expanded rehabilitation activities, more effective code enforcement, Section 8 housing opportunities, a tool-loan program and public information programs were the subject of numerous recommendations.

One of the areas of concern expressed in the report is the problem of the growing disparity between the City and the surrounding suburbs insofar as the number of poor (and often subsidized) families who seek and find housing opportunities. In order that the region not experience a worsening of the concentration of such families in any neighborhood or governmental jurisdiction, the report recommends that care be exercised in referral assistance, especially where relocation benefits are available.

By this letter, I am asking that your agency give particular attention to meeting the objective of metropolitan-wide housing counseling, in view of the obvious trend toward increased job opportunities and a truly diversified housing inventory outside the City. If the City Administration can be of further help or if you wish to discuss the matter, please do not hesitate to contact me.

Sincerely,

William J. Leidinger
City Manager

CC: Assistant City Manager Deese
Assistant City Manager Todd
Director of Planning and Community Development
Director of Developmental Programs
Executive Director, RR&HA

WJL:sam

ADDENDUM E

City of Richmond
Office of the City Manager

900 East Broad Street, Richmond, Virginia 23219
804 • 649-8386

April 10, 1978

Ms. Barbara Wurtzel, Executive Director
Housing Opportunities Made Equal
503 East Main Street
Richmond, Virginia 23219

Dear Ms. Wurtzel:

The Housing Action Plan, completed by the City in 1976, indicated a number of objectives to be kept in mind as we attempt to meet our citizens' housing needs.

One such objective relates to the problem of a growing disparity in the number of poor families and households who seek housing opportunities in the City versus the surrounding counties. So that no single governmental jurisdiction or neighborhood be subject to an increasing concentration of such families, the Housing Action Plan recommended that referral assistance be judiciously rendered. This is especially the case when relocation benefits are involved.

Therefore, this letter is to serve as a reminder to my September 2, 1977 correspondence in which I requested that your agency give particular attention to the objectives of ensuring that those families and households counseled are apprised of metropolitan-wide housing opportunities.

I would appreciate receiving a brief overview of your agency's activities and accomplishments towards the above-mentioned goal by the end of April. Additionally, I would like you to report, on a monthly basis, the number of clients referred to and number placed in housing outside the City of Richmond. The monthly information can be incorporated in your monthly reports to the Department of Developmental Programs.

Sincerely,

William V. Leidinger
City Manager

cc Assistant City Manager Deese
Assistant City Manager Todd
Director of Planning and Community Development
Director of Developmental Programs
Executive Director, RRHA
Principal Planner, Program Planning